

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

DYNAMIC DATA TECHNOLOGIES, LLC, §

Plaintiff, §

v. §

GOOGLE LLC AND YOUTUBE, LLC, §

Defendants. §

Civil Case No. 2:18-cv-466-RWS

JOINT MOTION TO TRANSFER TO THE DISTRICT OF DELAWARE

Plaintiff Dynamic Data Technologies, LLC and Defendants Google LLC and YouTube, LLC (collectively, the “Parties”), jointly and respectfully request that the Court enter an Order transferring the above-styled action to the District of Delaware. The Parties are in agreement on the request set forth herein. A proposed order is submitted herewith.

Dated: July 16, 2019

Respectfully submitted by:

/s/ Michael C. Hendershot, with permission by
Michael E. Jones

Michael C. Hendershot
mhendershot@jonesday.com

JONES DAY
1755 Embarcadero Road
Palo Alto, CA 94303
Tel: (650) 739-3939

Michael E. Jones
State Bar No. 10929400
mikejones@potterminton.com
POTTER MINTON, P.C.
110 N. College Ave., Suite 500
Tyler, Texas 75702
Tel: (903) 597-8311

**Attorneys for Defendants
Google LLC and YouTube LLC**

/s/ Daniel P. Hipskind, with permission by
Michael E. Jones

Elizabeth L. DeRieux
TX Bar No. 05770585
CAPSHAW DERIEUX, LLP
114 E. Commerce Ave.
Gladewater, Texas 75647
Telephone: 903-845-5770
E-mail: ederieux@capshawlaw.com

Dorian S. Berger (CA SB No. 264424)
Daniel P. Hipskind (CA SB No. 266763)
Eric B. Hanson (CA SB No. 254570)
BERGER & HIPSKIND LLP
9538 Brighton Way, Suite 320
Beverly Hills, California 90210
Telephone: 323-886-3430
Facsimile: 323-978-5508
E-mail: dsb@bergerhipskind.com
E-mail: dph@bergerhipskind.com
E-mail: ebh@bergerhipskind.com

Attorneys for Dynamic Data Technologies, LLC